

**UNITED STATES DISTRICT COURT  
DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION**

The State of KANSAS, the State of NORTH DAKOTA, the State of ALABAMA, the State of ARKANSAS, the State of FLORIDA, the State of IDAHO, the State of INDIANA, the State of IOWA, the Commonwealth of KENTUCKY, the State of MISSOURI, the State of MONTANA, the State of NEBRASKA, the State of NEW HAMPSHIRE, the State of OHIO, the State of SOUTH CAROLINA, the State of SOUTH DAKOTA, the State of TENNESSEE, the State of TEXAS, and the Commonwealth of VIRGINIA,

Plaintiffs,

v.

UNITED STATES OF AMERICA and the CENTERS FOR MEDICARE & MEDICAID SERVICES,

Defendants.

**CIVIL ACTION NO. 1:24-cv-00150-  
DMT-CRH**

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**PROPOSED DEFENDANT-INTERVENORS' NOTICE OF JOINDER TO  
DEFENDANTS' MOTION TO STAY PRELIMINARY INJUNCTION**

Proposed Defendant-Intervenors Claudia Moya Lopez, Hyun Kim, Dania Quezada Torres, and CASA Inc. (“Proposed Intervenors”) hereby join Defendants’ motion to stay the Court’s preliminary injunction and request for expedited ruling. ECF No. 119. As stated in Proposed Intervenors’ concurrently filed Notice of Appeal, Proposed Intervenors intend to appeal the effective denial of their motion to intervene and the Court’s granting of the Plaintiffs’ motion for a preliminary injunction. While the rules of appellate procedure require only that “[a] party must ordinarily move in first in the district court for … a stay of the judgment or order of a district court pending appeal,” Fed. R. App. P. 8(a)(1) (emphasis added), Proposed Intervenors file this notice of joinder out of an abundance of caution so that if this Court denies Defendants’ motion for a stay

of the Court's order granting Plaintiffs' preliminary injunction, ECF No. 117, Proposed Intervenors may seek a stay from the Eighth Circuit in connection with their appeal and Defendants' appeal.

Date: December 12, 2024

Respectfully submitted,

/s/ Matthew S. Rozen

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*Attorneys for Proposed Intervenors*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 12, 2024, I filed the foregoing Notice of Joinder using the Court's CM/ECF system, which will send a notice of the filing to counsel for all parties.

/s/ *Matthew S. Rozen*  
Matthew S. Rozen